

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

Alton Waggoner et al.,)	
)	
Plaintiffs,)	
)	Case No. 3:22-cv-02776-E
v.)	
)	
The City of Dallas, Texas et al.,)	
)	
Defendants.)	
)	

PLAINTIFFS' CORRECTED EXHIBIT LIST
FOR PRELIMINARY INJUNCTION HEARING

Plaintiffs Alton Waggoner, Teri Heishman, Hannah Lebovits, and Kawana Menchaca intend to introduce and admit into evidence the exhibits listed below at the Preliminary Injunction Hearing set for April 13, 2023.

Plaintiffs reserves the right to introduce as evidence any such documents or materials, as well as any other documents or materials not included herein as allowed by the Federal Rules of Evidence.

<u>Pls.' Ex. No.</u>	<u>Exhibit</u>	<u>Offered</u>	<u>Objections</u>	<u>Admitted</u>
1	Final & Adopted sec. 28-61.1			
2	Proposed Amendments to sec. 13-10			
3	Christopher J. Caso, Dallas City Attorney & Jill Hanin, Dallas Chief of Community Prosecution, Overview of Panhandling, Solicitation, and Available Strategies, City of Dallas (Feb. 3, 2021)			
4	City of Dallas Office of Homeless Solutions et al., Panhandling Deflection Program (Oct. 25, 2021)			
5	Memorandum from Christine Crossley, Director of Office of Homeless Solutions, to Members of City			

	Council Government Performance and Financial Management Committee (Apr. 25, 2022)			
6	Memorandum from Christine Crossley, Director of Office of Homeless Solutions, to Members of City Council Government Performance and Financial Management Committee (May 20, 2022)			
7	Memorandum from Jon Fortune, City of Dallas Deputy City Manager, to Members of the City Council's Public Safety Committee (Oct. 7, 2022)			
8	Christine Crossley, Director of Office of Homeless Solutions, et al., Panhandling Deflection Program Update, City of Dallas (June 27, 2022)			
9	Memorandum from Christine Crossley, Director of Office of Homeless Solutions, to Members of the Dallas City Council Government Performance and Financial Management Committee (Oct. 21, 2022)			
10	Declaration of Yafeuh Balogun			
11	Declaration of Kawana Scott			
12	Declaration of Steven Monacelli			
13	Declaration of Hannah Lebovits			
14	First Declaration of Alton Waggoner			
15	Declaration of Lafayette "Teri" Heishman			
16	Dallas Vision Zero Action Plan: Crash & Survey Data Analysis			
17	Dallas Vision Zero Action Plan			
18	Declaration of David Ragland			
19	Second Declaration of Alton Waggoner			
20	Parade Permit Ordinance section 28-187			
21	Affidavit of DOT Director G. Khankarli w/ Attachments			
22	Photo of Steven Monacelli and two others on median			
23	Photo of anti-CCP Protestors along clear zone			
24	Photo of Q-Anon Protestors in Clear Zone			
25	Photo GAFs GOTTA GO Protestor in Clear Zone			
26	Photo of Drag Queen Protestors on Median/Clear Zones			
27	Dallas City Council, October 26, 2022, City Council Agenda Meetings, Item 16 (Part 2 of 2), DALLAS CITY NEWS NETWORK (Oct. 26, 2022), https://dallastx.swagit.com/play/10262022-855			
28	Dallas City Council, Government Performance & Financial Management Committee, DALLAS			

	CITY NEWS NETWORK (Oct. 25, 2021), https://dallastx.swagit.com/play/10262021-529			
29	Dallas City Council, 21-17 Panhandling and Solicitation, Overview and Available Strategies, DALLAS CITY NEWS NETWORK (Feb. 3, 2021), https://dallastx.swagit.com/play/02032021-715			
30	Dallas City Council, <i>April 18, 2022, Transportation & Infrastructure</i> , DALLAS CITY NEWS NETWORK at 2:40:30 (Apr. 18, 2022), https://dallastx.swagit.com/play/04182022-541 .			

Dated: April 12, 2023

Respectfully,

/s/ Travis Fife

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